



Management Instruction

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	Originating Organization & OCC Code Administrative Services Group (ASG) AS1	
Title Waste Reduction	Signature & Title Mitchell H. Gordon <i>Mitchell H. Gordon</i> Senior Assistant Postmaster General, ASG	

I. Purpose

This Management Instruction describes Postal Service policies and guidelines for reducing or minimizing the quantity of nonhazardous and hazardous waste generated at postal facilities in accordance with federal compliance regulations summarized in section II. This instruction outlines environmental considerations and procedures for ordering supplies and services and identifies preferable waste reduction options.

II. Background

Waste reduction is the second phase of the Postal Service pollution prevention program. The first phase—recycling—is covered in Handbook AS-550, *Recycling Guide*. Specific instructions for reducing waste at its source will be presented in Handbook AS-552, *Waste Reduction Guide*, which will be published in early 1992. Postal Service waste reduction responds to the following:

- a. *Resource Conservation and Recovery Act of 1976 (RCRA)*. Addresses (1) dangers to human health and the environment posed by improper waste disposal and (2) conservation of valuable material and energy resources. The Environmental Protection Agency (EPA) administers RCRA. State hazardous waste management programs incorporate RCRA standards and include additional requirements for the classification, generation, storage, treatment, and disposal of hazardous waste. In accordance with RCRA Section 6002, the Postal Service is adopting a policy to develop an affirmative procurement program. This program will include (1) preference pricing and specifications favoring recycled materials, (2) promotional efforts, (3) procedures

for obtaining and verifying estimates, (4) procedures for certifying the content of recovered materials, and (5) annual review, reporting, and monitoring. Procedures to implement the affirmative procurement program are under development.

- b. *Pollution Prevention Act of 1990*. Establishes a national policy that pollution should be prevented or reduced at the source whenever feasible.
- c. *Executive Order 12780 of October 31, 1991, Federal Agency Recycling and the Council on Federal Recycling and Procurement Policy*. Requires federal agencies to promote cost-effective waste reduction and recycling of reusable materials from wastes generated by federal government activities. See Executive Order 12780 attached as Exhibit II-c.

III. Policy

A. General

In performing its mission to provide prompt, reliable, and efficient postal services to all communities, the Postal Service will conduct its activities in a manner protecting human health and the environment. In establishing postal regulations and practices, the Postal Service will, as appropriate, follow the guidelines for environmental protection that are set forth in the *Administrative Support Manual 550*.

B. Postal Service Commitment

Although postal recycling programs will play an increasingly important role in managing wastes, from an economic and environmental perspective it is far better to reduce wastes in the first place than to deal with their aftermath. The Postal Service is committed to reducing waste and pollutants at the source of

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generation. Postal priorities for solid and liquid nonhazardous and hazardous waste management are:

- a. Source reduction
- b. Recycling
- c. Energy conservation and recovery
- d. Waste treatment
- e. Waste disposal

C. Compliance

The Postal Service will comply with all applicable environmental laws and regulations governing its activities and will not hesitate to exceed legal requirements when, in its judgment, such action is in order.

IV. Scope

The policies and guidelines in this management instruction apply to all Postal Service managers, programs, projects, products, and services.

V. Definitions

The following terms are central to this management instruction

- a. *Hazardous Waste.* By-products of society that can pose a hazard or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity) or appears on special EPA lists.
- b. *Recovered Materials.* Waste materials and by-products that have been recovered or diverted from solid waste, excluding materials and by-products generated from, and commonly used within, an original manufacturing process.
- c. *Recyclable Materials.* Materials that still have useful physical or chemical properties after serving their original purpose and that can be reused or remanufactured into new products.
- d. *Recycled Materials.* Materials, which otherwise would have been destined for disposal, that have been collected, reprocessed or remanufactured, and made available for reuse.
- e. *Waste.* Any material discarded as worthless, defective, or of no further use that, when disposed of, may pose a threat to human health or the environment.
- f. *Waste Reduction.* Any change in a process, operation, or activity that results in the economically efficient reduction in waste material per unit of production without reducing the value output of the process, operation, or activity, taking

into account the health and environmental consequences of such change.

VI. Objectives

The fetus of the waste reduction program is to investigate opportunities, identify options, and perform feasibility analyses to reduce waste materials and recover residual values of those materials formerly discarded. By implementing a strong waste reduction program, the Postal Service can reduce costs, paperwork, liability, and pollution, as well as create a cleaner, safer, and more efficient work environment. Handbook AS-552 will provide managers with information that will enable them to:

- a. Develop methods for measuring the amounts of waste generated and extent of source reduction accomplished.
- b. Determine the supplier and employee interactions that underlie Postal Service waste generation patterns.
- c. Evaluate how source reduction works in practice, including potential and limitations of economic incentives and disincentives.
- d. Compare the economic impact of using reusable products instead of disposable ones.
- e. Develop realistic and safer alternatives to the use of toxic substances, with the goal of reducing, by 1995, the use of 17 hazardous chemicals that have been identified by EPA's Industrial Toxics Project and will be listed in Handbook AS-552.

VII. Implementation

A. General

The amounts and types of wastes generated by the Postal Service are determined by how it uses products, how it purchases products, and how the products are made and packaged. The selection of particular waste reduction practices must be based on an analysis of the types of waste generated, individual facility needs, and life-cycle costs from acquisition through disposal.

B. Strategies

The Postal Service can use several strategies, discussed below, to reduce or eliminate hazardous and nonhazardous wastes before these wastes are generated. In identifying and implementing waste reduction methods, Postal Service personnel must give first priority to options that are low-cost over the long term, are technically easy to implement, and can show immediate and short-term results.

1. Inventory Management. Avoid keeping more material on hand than is needed because this ties up financial resources and increases the potential for waste because of such factors as limited shelf life and obsolescence. Techniques to reduce or eliminate inventory include container management, purchase-quantity management, the slow-moving-inventory report, and just-in-time manufacturing. Inventory information can be useful for quantifying the amount of source reduction achieved through certain changes, and it can be a powerful tool for stimulating source reduction measures. Handbook AS-701, *Material Management*, Chapter 3, provides policy for inventory management in the Postal Service. Publication 41, *Postal Service Procurement Manual*, is being revised to take into account environmental contracting.

2. Raw Material Substitution and Product Reformulation. Where possible, substitute nontoxic substances for toxic ones, products with longer shelf lives for those with shorter shelf lives, and products containing recovered materials for non-recycled products. Water-based cleaners, coatings, and inks, for example, can replace solvent-based products and eliminate the related hazardous wastes. Postal offices that require paper, lubricating oil, insulation, or tires should request that these products meet or exceed minimum content standards for recovered materials.

3. Process Modification. Reduce pollution by upgrading old equipment or revising methods of operation to enhance the use of nonhazardous, less hazardous, or fewer raw materials.

4. Material Reuse, Recycling, and Reclamation. Recycle or reuse by-products, where possible. For example, used antifreeze can be drained from a Postal Service vehicle, processed, and re-introduced into the vehicle.

5. Reduction in Material Volume. Purchase products made with and packaged in less material and make more efficient use of materials (such as making double-sided photocopies) to reduce the volume of waste.

6. Decreased Consumption. Encourage greater use of recyclable products and encourage more prudent use of all types of products to reduce waste.

C. Specific Approaches

Forthcoming Handbook AS-552 will describe in greater detail methods and procedures for reducing nonhazardous and hazardous waste. It will present management and housekeeping practices that apply to all postal facilities, and it will provide specific guidance and planning tools to assist managers in reducing waste in operations and at laboratories, training facilities, printing operations, and vehicle and equipment maintenance facilities. The handbook will

describe acceptable methods for managing specific types of wastes.

VIII. Responsibilities

A. General

The Postal Service is legally and socially responsible for safely managing the materials used in its operations and the waste it produces. Because the waste reduction program applies to all facilities, all administrative and operational activities must, to the maximum extent possible, participate in waste reduction by developing facility-specific plans. Plans must include the following:

- a. Waste-stream assessment
- b. Identification of pollution prevention opportunities and practices
- c. Facility-specific annual goals
- d. An annual review of achievements resulting from program tracking and measurement

B. Headquarters

1. Senior Assistant Postmaster General, Administrative Services Group. Is the Chief Environmental Officer for the Postal Service and is responsible for the overall development of policies to implement this program.

2. All Departments and Requirements-generating Offices. Must manage their respective functional areas to ensure compliance with the intent of this management instruction.

3. Environmental Management Division, Administrative Services Group. Is responsible for developing integrated environmental policies and methods for compliance with RCRA Section 6002, the Pollution Prevention Act of 1990, Executive Order 12780, and other federal laws and regulations, and it is responsible for tracking proposed and actual regulatory changes. This division also will serve as an information center and assist in developing an education program to provide information about the importance of source reduction. An awards program will be implemented to recognize outstanding source reduction leadership.

C. Regions

The regional environmental steering committees must ensure management participation and compliance at all levels of the field organization and provide assistance to field divisions. Regional environmental coordinators are responsible for program implementation, development, tracking, monitoring, and reporting. Regions will provide comprehensive

status reports to Headquarters for the National Reporting System.

D. Divisions

Division general managers are responsible for designating an environmental coordinator to develop, track, monitor, and report on source reduction, recycling, and individual waste reduction projects and programs at all levels of their organizations. The division environmental coordinator must ensure the implementation of sound environmental practices outlined in this management instruction, in forthcoming Handbook AS-552, and in Executive Order 12780. Field divisions will be responsible for submitting monthly status reports to regional coordinators.

E. Associate Offices, Stations, and Branches

Postmasters, station managers, and supervisors are responsible for forming waste reduction teams, establishing waste reduction programs, and encouraging employee participation. They are responsible for developing environmental awareness, by reducing hazardous and nonhazardous materials in their inventories and by purchasing recyclable and

recycled products. If there is no local program to reuse or recycle waste materials, these managers should explore other ways to recycle.

IX. Available Resources and Related Directives

The regional environmental steering committees, as well as state and local agencies, can provide further information about waste reduction. In addition, the following documents provide information that is relevant to waste reduction:

- a. Handbook AS-552, *Waste Reduction Guide* (available in early 1992; an announcement will appear in the *Postal Bulletin*).
- b. Management Instruction AS-550-91-10, *Pollution Prevention Program*.
- c. Handbook AS-550, *Recycling Guide*.
- d. *Administrative Support Manual 550*.
- e. Executive Order 12780 of October 31, 1991, *Federal Agency Recycling and the Council on Federal Recycling and Procurement Policy*.

56289

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Presidential Documents

Title 3—

Executive Order 12780 of October 31, 1991

The President

Federal Agency Recycling and the Council on Federal Recycling and Procurement Policy

WHEREAS, this Administration is determined to secure for future generations of Americans their rightful share of our Nation's natural resources, as well as a clean and healthful environment in which to enjoy them; and

WHEREAS, two goals of this Administration's environmental policy, cost-effective pollution prevention and the conservation of natural resources, can be significantly advanced by reducing waste and recycling the resources used by this generation of Americans; and

WHEREAS, the Federal Government, as one of the Nation's largest generators of solid waste, is able through cost-effective waste reduction and recycling resources to conserve local government disposal capacity; and

WHEREAS, the Federal Government as the Nation's largest single consumer, is able through affirmative procurement practices to encourage the development of economically efficient markets for products manufactured with recycled materials;

NOW, THEREFORE, I, GEORGE BUSH, by the authority vested in me as President by the Constitution and the laws of the United States of America, including the Solid Waste Disposal Act, Public Law 89-272, 79 Stat. 997, as amended by the Resource Conservation and Recovery Act ("RCRA"), Public Law 94-580, 90 Stat. 2795 (1976), hereby order as follows:

PART I—PREAMBLE

Section 101. The purpose of this Executive order is to

(a) Require that Federal agencies promote cost-effective waste reduction and recycling of reusable materials from wastes generated by Federal Government activities.

(b) Encourage economically efficient market demand for designated items produced using recovered materials by directing the immediate implementation of cost-effective Federal procurement preference programs favoring the purchase of such items.

(c) Provide a forum for the development and study of policy options and procurement practices that will promote environmentally sound and economically efficient waste reduction and recycling of our Nation's resources.

(d) Integrate cost-effective waste reduction and recycling programs into all Federal agency waste management programs in order to assist in addressing the Nation's solid waste disposal problems.

(e) Establish Federal Government leadership in addressing the need for efficient State and local solid waste management through implementation of environmentally sound and economically efficient recycling.

Sec. 102. Consistent with section 6002(c)(1) of RCRA (42 U.S.C. 6962(c)(1)), activities and operations of the executive branch shall be conducted in an environmentally responsible manner, and waste reduction and recycling opportunities shall be utilized to the maximum extent practicable, consistent with economic efficiency.

Sec. 103. Consistent with section 6002(c)(2) of RCRA (42 U.S.C. 6962(c)(2)), agencies that generate energy from fossil fuel in systems that have the

technical capacity of using energy or fuels derived from solid waste as a primary or supplementary fuel shall use such capability to the maximum extent practicable.

PART 2—DEFINITIONS

For purposes of this order:

Sec. 201. “Federal agency” means any department, agency, or other instrumentality of the executive branch.

Sec. 202. “Procurement” and “acquisition” are used interchangeably to refer to the processes through which Federal agencies purchase products.

Sec. 203. “Recovered materials” is used as defined in section 1004(19) and 6002(h) of the Resource Conservation and Recovery Act (42 U.S.C. 6903(19) and 6962(h)), as amended.

Sec. 204. “Recycling” means the diversion of materials from the solid waste stream and the beneficial use of such materials. Recycling is further defined as the result of a series of activities by which materials that would become or otherwise remain waste, are diverted from the solid waste stream by collection, separation and processing and are used as raw materials in the manufacture of goods sold or distributed in commerce or the reuse of such materials as substitutes for goods made of virgin materials.

Sec. 205. “Waste reduction” means any change in a process, operation, or activity that results in the economically efficient reduction in waste material per unit of production without reducing the value output of the process, operation, or activity, taking into account the health and environmental consequences of such change.

PART 3—SOLID WASTE RECYCLING PROGRAMS

Sec. 301. *Recycling Programs.* Each Federal agency that has not already done so shall initiate a program to promote cost-effective waste reduction and recycling of reusable materials in all of its operations and facilities. These programs shall foster (a) practices that reduce waste generation, and (b) the recycling of recyclable materials such as paper, plastic, metals, glass, used oil, lead acid batteries, and tires and the composting of organic materials such as yard waste. The recycling programs implemented pursuant to this section must be compatible with applicable State and local recycling requirements..

Sec. 302. *Contractor Operated Facilities.* Every contract that provides for contractor operation of a Government-owned or leased facility, awarded more than 210 days after the effective date of this Executive order, shall include provisions that obligate the contractor to comply with the requirements of this Part as fully as though the contractor were a Federal agency.

PART 4—VOLUNTARY STANDARDS

Sec. 401. *Amendment of OMB Circular No. A-119.* The Director of the Office of Management and Budget (“OMB”) shall amend, as appropriate, OMB Circular No. A-119, “Federal Participation in the Development and Use of Voluntary Standards,” to encourage Federal agencies to participate in the development of environmentally sound and economically efficient standards and to encourage Federal agency use of such standards.

PART 5—PROCUREMENT OF RECOVERED MATERIALS

Sec. 501. *Adoption of Affirmative Procurement Programs.* Within 180 days after the effective date of this order, each Federal agency shall provide a report to the Administrator of the Environmental Protection Agency regarding the Agency’s adoption of an affirmative procurement program; such programs are required by section 6002(i) of RCRA (42 U.S.C. 6962(i)). Within 1 year of the issuance of this order, the Administrator of the Environmental Protection Agency shall report to the President regarding the compliance of each Federal agency with this requirement.

Sec. 502. Annual Review of Affirmative Procurement Programs. In accordance with section 6002(i) of RCRA (42 U.S.C. 6962(i)), each Federal agency shall review annually the effectiveness of its affirmative procurement program and shall provide a report regarding its findings to the Environmental Protection Agency and to the Office of Federal Procurement Policy, beginning with a report covering fiscal year 1992. Such report shall be transmitted by December 15 each year. Reports required by this section shall be made available to the public.

PART 6—RECYCLING COORDINATORS AND THE COUNCIL ON FEDERAL RECYCLING AND PROCUREMENT POLICY

Sec. 601. Federal Recycling Coordinator. Within 90 days after the effective date of this order, the Administrator of the Environmental Protection Agency shall designate a senior official of that Agency to serve as the Federal Recycling Coordinator. The Federal Recycling Coordinator shall review and report annually to OMB, at the time of agency budget submissions, the actions taken by the agencies to comply with the requirements of this order.

Sec. 602. Designation of Recycling Coordinators. Within 90 days after the effective date of this order, the head of each Federal agency shall designate an agency employee to serve as Agency Recycling Coordinator. The Agency Recycling Coordinator shall be responsible for:

(a) coordinating the development of an effective agency waste reduction and recycling program that complies with the comprehensive implementation plan developed by the Council on Federal Recycling and Procurement Policy;

(b) coordinating agency action to develop benefits, costs, and savings data measuring the effectiveness of the agency program; and

(c) coordinating the development of agency reports required by this Executive order and providing copies of such reports to the Environmental Protection Agency.

Sec. 603. The Council on Federal Recycling and Procurement Policy. (a) A Council on Federal Recycling and Procurement Policy is hereby established. It shall comprise the Federal Recycling Coordinator, the Chairman of the Council on Environmental Quality, the Administrator of the Office of Federal Procurement Policy, and the Agency Recycling Coordinator and the Procurement Executive of each of the following agencies: the Environmental Protection Agency, the Department of Defense, the General Services Administration, the National Aeronautics and Space Administration, the Department of Energy, the Department of Commerce, and the Department of the Interior. The Federal Recycling Coordinator shall serve as Chair of the Council.

(b) Duties. The Council on Federal Recycling and Procurement Policy shall:

(1) identify and recommend to OMB, initiatives that will promote the purposes of this order, including:

(A) the development of appropriate incentives to encourage the economically efficient acquisition by the Federal Government of products that reduce waste and of products produced with recycled materials;

(B) the development of appropriate incentives to encourage active participation in economically efficient Federal waste reduction and recycling programs; and

(C) the development of guidelines for cost-effective waste reduction and recycling activities by Federal agencies;

(2) review Federal agency specifications and standards and recommend changes that will enhance Federal procurement of products made from recycled and recyclable materials, taking into account the costs and the performance requirements of each agency;

(3) collect and disseminate Federal agencies' information concerning methods to reduce wastes, types of materials that can be recycled, the costs and savings associated with recycling, and the current market sources and

56292 Federal Register / Vol. 56, No. 213 / Monday, November 4, 1991 / Presidential Documents

prices of products that reduce waste and of products produced with recycled materials;

(4) assist the development of cost-effective waste reduction and recycling programs pursuant to this order by developing guidelines for agency waste reduction and recycling programs and by identifying long-range goals for Federal waste reduction and recycling programs;

(5) provide meaningful data to measure the effectiveness and progress of Federal waste reduction and recycling programs;

(6) provide guidance and assistance to the Agency Recycling Coordinators in setting up and reporting on agency programs; and

(7) review Federal agency compliance with section 103 of this order.

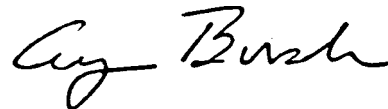
PART 7—LIMITATION

Sec. 701. This order is intended only to improve the internal management of the executive branch and shall not be interpreted to create any right or benefit, substantive or procedural, enforceable at law by a party against the United States, its officers, or any other person.

Sec. 702. Section 502 and Part 6 of this order shall be effective for 5 years only, beginning on the effective date of this order.

Sec. 703. This order shall be effective immediately.

THE WHITE HOUSE,
October 31, 1991.



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